

G

2/7/2018

Zimmlaw Mail - Miss Jones LLC v. Stiles, Case No.: 7:17-cv-01450-NSR



Naomi Trainer <ntrainer@zimmlaw.com>

Miss Jones LLC v. Stiles, Case No.: 7:17-cv-01450-NSR

Naomi Trainer <ntrainer@zimmlaw.com>

Wed, Feb 7, 2018 at 9:46 AM

To: Michael Zimmerman <michael@zimmlaw.com>, Khadisha Telfer <ktelfer@zimmlaw.com>, "Jeffrey_Klein Esq." <jklaw@hotmail.com>

Good morning,

We have not received any responses from you to our Interrogatories or Discovery Demands. If you believe that your client responded, please forward your client's responses today.

Attached hereto once again are our Interrogatories and Discovery Demands.

With regards to the outstanding deposition questions, this can be cured by your client returning to New York at his expense to complete the deposition, whereby pursuant to FRCP Rule 30(c)(2): your objections can be noted on the record and the testimony is taken subject and the questions are answered. Please let us know in the next 2 days several possible dates for this.

Sincerely,

Naomi Trainer, Esq.
Senior Associate**ZIMMERMAN LAW**
P.C.Zimmerman Law, P.C.
315 Walt Whitman Rd, Ste. 215
Huntington Station, N.Y. 11746
Office: (631) 415-0900
Facsimile (631) 415-0910
ntrainer@zimmlaw.com

The information contained in this message may be privileged and confidential and protected from disclosure. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this Communication in error, please notify us immediately by replying to the message and deleting it from your computer.

[Quoted text hidden]

2 attachments**Our Interrogatories.pdf**
152K**Plaintiff's Request for Discovery.pdf**
103K